IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
W. R. GRACE & CO., et al.,1)	Case No. 01-01139 (JKF)
Debtors.)	(Jointly Administered)

CERTIFICATION OF COUNSEL REGARDING STIPULATION AND ORDER REGARDING PROOFS OF CLAIM OF BUILDING LABORERS LOCAL UNION 310 (CLAIM NOS. 879 AND 2785)

The undersigned hereby certifies that:

1. On April 2, 2001 (the "Petition Date"), the above-captioned debtors and debtors in possession (collectively, the "Debtors") commenced their respective reorganizations by

The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

filing voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code, as amended from time to time (the "Bankruptcy Code"). The Debtors continue to operate their businesses and manage their properties as debtors and debtors in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

- 2. This Court issued its bar date Order on April 22, 2002, which established March 31, 2003 as the bar date for the filing of certain pre-petition (a) non-asbestos, (b) asbestos property damage and (c) medical monitoring claims.
- 3. On January 18, 2002, the Building Laborers Local Union 310 (the "Claimant") filed a proof of claim in the above-referenced bankruptcy case, on account of alleged "Asbestos Contamination" in the property located at 3250 Euclid Avenue, Cleveland OH 44115. This claim was assigned Claim No. 879.
- 4. On February 6, 2003, the Claimant filed an Asbestos Property Damage

 Proof of Claim in the above-referenced bankruptcy cases, on account of alleged asbestos property

 damage in the Subject Property. This claim was assigned Claim No. 2785.
- 5. On September 1, 2005, the Debtors filed their Fifteenth Omnibus Objection to Claims (Docket No. 9315) which asserted various objections to Claim Nos. 879 and 2785.
 - 6. The parties have conferred and agreed on the Stipulation attached hereto as Exhibit A.

7. The Debtors respectfully request that this Court enter the attached proposed order at its earliest convenience.

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and

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Possession